

Advocates for Workplace Fairness

February 11, 2021

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Via ECF

Honorable Alison J. Nathan United States District Court Southern District of New York Thurgood Marshall Courthouse 40 Foley Square New York, NY 10007

Re: Hughes-Phillips v. New York Life Ins. Co., No. 20 Civ. 10158 (S.D.N.Y.)

Dear Judge Nathan:

We represent Plaintiff Aliea Hughes-Phillips ("Plaintiff") in the above-referenced matter. We join with Defendant New York Life Insurance Company ("New York Life" or "Defendant") to request that the Court adjourn the Initial Pretrial Conference currently scheduled for February 19, 2021, ECF No. 9, and related deadlines, as a result of the parties agreement to engage in good faith settlement discussions. This is the parties' first request to extend out these deadlines.

Specifically, the parties request that the Court either: (i) enter a stay of all proceedings; or, if it is the Court's preference, (ii) extend out all applicable deadlines by thirty days. The deadlines that would be implicated are as follows:

SO ORDERED.

• New York Life's deadline to answer or otherwise respond to the complaint, which is currently February 12, 2021 (if the Court extended this deadline by thirty-days, it would be extended until March 15, 2021);

- The parties' deadline to provide a joint proposed case management plan to the Court, which is currently February 12, 2021; and
- The Court's Initial Pretrial Conference, which is currently scheduled for February 19, 2021.

Should the Court extend the time before the Initial Pretrial Conference, instead of staying the matter, the parties are available for a rescheduled conference on March 26, 2021, April 2, 2021, or April 9, 2021.

The parties are to submit a joint letter by March 15, 2021 updating the Court on the status of settlement.

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We thank the Court for its attention in this matter.

Respectfully submitted,

Christopher M. McNerney

cc: Parties of Record (via ECF)